

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**CELLULAR COMMUNICATIONS  
EQUIPMENT LLC,**

**Plaintiff,**

**v.**

**HMD GLOBAL OY,**

**Defendant.**

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**Case No. 2:20-CV-0078-JRG**

**JURY TRIAL DEMANDED**

**JOINT MOTION TO EXTEND STAY OF ALL DEADLINES**

Plaintiff Cellular Communications Equipment LLC and Defendant HMD Global Oy (collectively, the “Parties”) respectfully submit this Joint Motion to Extend the Stay of All Deadlines. The Parties respectfully inform the Court as follows:

As set forth in the Parties’ January 29 Joint Motion to Stay All Deadlines and Notice of Settlement (Dkt. No. 94), the Parties have reached a settlement in principle of all matters in controversy. The Parties have since agreed to the terms of a Settlement and Patent License Agreement (the “Agreement”). The Court granted the Parties’ joint motion extend the stay for an additional fourteen days to March 18, 2021, to allow the Parties to complete performance under the Agreement (Dkt. No. 97). Due to a technological issue, the Parties have yet to complete performance. The Parties are actively working together to resolve the issue and complete performance.

Accordingly, the Parties jointly request that the Court extend the current stay for an additional fourteen (14) days to allow the Parties to resolve the technological issue and complete performance. A proposed order is submitted herewith.

Dated: March 18, 2021

Respectfully submitted,

<p><u>/s/ Hunter S. Palmer</u> Jeffrey R. Bragalone (lead attorney) Texas Bar No. 02855775 Jerry D. Tice II Texas Bar No. 24093263 Hunter S. Palmer Texas Bar No. 24080748</p> <p><b>BRAGALONE OLEJKO SAAD PC</b> 2200 Ross Avenue Suite 4500W Dallas, TX 75201 Tel: (214) 785-6670 Fax: (214) 785-6680 jbragalone@bosfirm.com jtice@bosfirm.com hpalmer@bosfirm.com</p> <p><b>ATTORNEYS FOR PLAINTIFF CELLULAR COMMUNICATIONS EQUIPMENT LLC</b></p>	<p><u>/s/ Deron R. Dacus</u> Deron R. Dacus State Bar No. 00790553 <b>The Dacus Firm, P.C.</b> 821 ESE Loop 323, Suite 430 Tyler, TX 75701 +1 (903) 705-1117 +1 (903) 581-2543 facsimile ddacus@dacusfirm.com</p> <p>Matthew S. Warren (California Bar No. 230565) Jen Kash (California Bar No. 203679) Erika Warren (California Bar No. 295570) <b>Warren Lex LLP</b> 2261 Market Street, No. 606 San Francisco, California 94114 +1 (415) 895-2940 +1 (415) 895-2964 facsimile 20-78@cases.warrenlex.com</p> <p><b>ATTORNEYS FOR DEFENDANT HMD GLOBAL OY</b></p>
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**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(h), (i), I certify that counsel for CCE conferred with counsel for HMD via email. The Parties agree to the form and substance of the Motion, the Motion is unopposed, and the parties jointly submit it to the Court.

/s/ Hunter S. Palmer  
Hunter S. Palmer

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on March 17, 2021.

/s/ Hunter S. Palmer  
Hunter S. Palmer